

Before the
FEDERAL COMMUNICATIONS COMMISSION **RECEIVED**
 Washington, DC 20554

JAN - 6 2006

In the Matter of

Federal Communications Commission
Office of Secretary

Amendment of Section 73.202(b))	
Table of Allotments)	MB Docket No. 05-282
FM Broadcast Stations)	RM - 11229
(Rockmart and Aragon, Georgia, and)	
Lynchburg and Chattanooga, Tennessee))	
)	

To: Office of the Secretary
 Attn: Assistant Chief, Audio Division
 Media Bureau

MOTION TO ACCEPT RESPONSE TO REPLY COMMENTS

J. L. Brewer Broadcasting of Cleveland, LLC, licensee of Station WAYA(FM), Spring City, Tennessee, and J. L. Brewer Broadcasting, LLC, licensee of Station WMPZ(FM), Ringgold, Georgia, ("Brewer"), by its counsel, hereby moves for acceptance of the accompanying Response. The purpose of the pleading is to respond to the Reply Comments filed by Tri-State Communications, Inc. ("Tri-State") and to assist the Commission in resolving this proceeding on the basis of a complete record. *See* 47 C.F.R. 1.415(d); *Nogales, Vail and Patagonia, Arizona*, 16 FCC Rcd 20515 n.5 (2001).

While Tri-State filed its Reply Comments on December 20, 2005, Brewer's counsel did not receive them until December 30 due to a problem with the mail. Tri-State's counsel acknowledged this service problem in a letter that it sent to Brewer's counsel. In addition, Tri-State's Reply Comments were premature. They should be filed after Brewer's Counterproposal is released on Public Notice because they pertain to the Brewer Counterproposal rather than any proposal detailed in the *NPRM*. Thus, Brewer is now filing its response to Tri-State's Reply

Comments in anticipation of a Public Notice and reserves the right to file an additional pleading once a Public Notice is released.

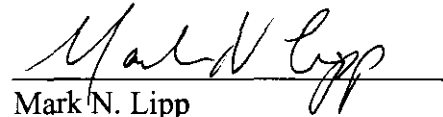
WHEREFORE, Brewer respectfully requests the acceptance and consideration of its Response.

Respectfully submitted,

J. L. BREWER BROADCASTING OF
CLEVELAND, LLC

J. L. BREWER BROADCASTING, LLC

By:



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January 6, 2006

Their Counsel

CERTIFICATE OF SERVICE

I, Diana Gonzales in the law firm of Vinson & Elkins, do hereby certify that I have on this 6th day of January, 2006, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Motion**" to the following:

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